

December 27, 2005

Secretary of Agriculture Mike Johanns Farm Bill 1400.Independence Ave., SW. . . . . Washington, D.C. 20250-3355

Dear Secretary Johanns:

I appreciate the opportunity to submit these recommendations for improvements to the Food Stamp Program for your consideration as the Department of Agriculture prepares for reauthorization of the Farm Bill in 2007. Greater Boston Legal Services provides assistance to Food Stamps applicants and recipients throughout Boston and 31 surrounding cities and towns, including working families, those suffering from disabilities and/or homelessness, immigrants and those with limited English proficiency. The Food Stamps program is essential to the well-being of our clients and their children. Our recommendations are based on our extensive experience representing individuals and families, as well as working with the Massachusetts Department of Transitional Assistance to improve access to Food Stamps in our state.

We strongly agree with basic principles, articulated by the many anti-hunger organizations who spoke at the Farm Bill Nutrition Forums, that: a) the amount of the Food Stamp benefit should be increased to reflect the real costs of an adequate, healthy diet; and b) income and asset eligibility limits should be raised to ensure that everyone who needs Food Stamps to meet their nutritional needs – for example, due to high expenses for housing or medications – is able to participate in the program. Our recommendations below, however, focus on specific adjustments that we believe would greatly improve the program regardless of whether benefit and eligibility levels are increased.

## Recommendations

Eligibility

Fully restore eligibility for legal immigrants, including eliminating sponsor deeming. The current restrictions not only deprive those who are living legally and permanently in the United States of access to proper nutrition, they are complicated and confusing for state workers

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to implement. Moreover, giving adult immigrants access to the Food Stamp program will reduce fears within immigrant communities and encourage them to obtain benefits for their eligible children.

- Allow participants aged 18 22 who are living with their parents to apply separately from their parents. Although living under the same roof, adult children and their parents frequently do not share a budget. We have had cases where destitute parents were denied Food Stamps because their 19- or 20-year-old children refused to provide information about their wages, or where the children refused to contribute to household expenses. Conversely, when these children have children of their own, they may receive their own cash welfare grants; thus, denying them their own Food Stamps grants is therefore inconsistent. Moreover, in some of our cases, the parents of parents under age 22 do not provide close to adequate help to the young parent and her child.
- 3. Fully restore eligibility for able-bodied adults without dependents. Eliminate time limits and work requirements, which should not be barriers to participation in a nutrition program.
- 4. Continue "categorical eligibility" options. This provision has dramatically simplified the application process and successfully facilitated the participation of eligible families in the Food Stamp program in Massachusetts. It also saves administrative staff time, allowing that time to be better used toward the effort to timely process applications and recertifications.

## **Benefits Amount**

- 5. Raise the minimum categorical benefit. Many clients have told us that the current minimum of \$10 is so low that is not worth the effort it takes to apply or recertify for Food Stamps. Raising the minimum benefit would provide a real incentive for categorically eligible families to participate in the program.
- 6. Increase deductions for child care, housing, and earned income. Recipients who require full-time child care in order to work usually pay far in excess of the current monthly limit. Similarly, many of our clients' greatest barrier to making ends meet is excessive costs for rent and winter heating. Deductions that better reflected their real costs would go a long way toward ensuring that these households do not go hungry. In addition, the current 20% deduction from gross earnings accounts for the taxes that are withheld from working families' pay checks, but does not provide an incentive for securing or increasing employment.
- 7. Provide a standard medical deduction for elderly and disabled recipients. Similar to the standard utility allowances already in use, this would greatly simplify processing of these cases and enable these vulnerable recipients to maximize their Food Stamp benefits. (Those with medical expenses that exceed the standard deduction should be allowed to use their actual costs.)

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## Administration

- 8. Give states credit for increased participation of eligible households when calculating error rates. State workers' fear of being found in error encourages practices, such as excessive demands for verifications, that deter eligible households from participating.
- 9. Increase funds for Food Stamp Program administration. States need more funding to ensure that staffing is adequate to process and maintain Food Stamp cases in a timely and accurate manner.

Please do not hesitate to contact me if you have questions or would like to discuss any of these recommendations further. I may be reached at (617) 603-1621 or <a href="mayer@gbls.org">nmeyer@gbls.org</a>. Again, thank you for your consideration.

Sincerely,

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